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September 27, 2024

## VIA ECF

The Hon. Victoria Reznik, U.S.M.J.
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street
White Plains, New York 10601

Re: Maria Panuccio et al. v. Weichert Workforce Mobility Inc. et al. Case No.: 7:23-cv-1366-VR

Judge Reznik:

We represent the Defendants in this matter. We respectfully submit this letter as a joint status update summarizing the status of discovery pursuant to the Court's instructions in the docket text entry dated August 2, 2024 (ECF Doc. No. 43).

Unfortunately, there has been no progress in discovery or change in the status of this matter since my last update submitted on July 31<sup>st</sup> (ECF Doc. No. 42).

As previously discussed during the telephonic status conference on June 18<sup>th</sup>, Defendants have already served initial disclosures, interrogatories, and requests for production. Plaintiffs have not yet provided either their initial disclosures, discovery responses, or any written discovery demands of their own. The deadline for such response was extended to August 1<sup>st</sup> in the Court's Scheduling Order (ECF Doc. No. 41). I have made several efforts to resolve these issues with the representative who has been assisting the *pro se* Plaintiffs in this matter. However, Plaintiffs have still not provided the outstanding discovery.

Pursuant to Your Honor's Individual Practices, I will write under separate cover regarding a request to file a motion in light of the above.

Last, if the Court is inclined to schedule a conference in this matter, I would respectfully request that any such conference be scheduled after October 15, 2024. I will be beginning a trial

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in the Superior Court of New Jersey on Monday, September  $30^{th}$ , which is likely to continue for two weeks or more.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Zachary D. Wellbrock

cc: Plaintiffs (via email)

The Court is in receipt of Defendant's letter and thanks them for the update. Plaintiff is directed to respond to Defendant's letter by no later than <u>October 7, 2024</u>. By separate order, the Court will schedule a status conference for after October 15, 2024, to discuss the discovery dispute identified in this letter.

SO ORDERED

Hon, Victoria Reznik, U.S.M.J.

Dated: 09-30-24